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August 5, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-98-4390 - 52
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

**RE: DOCKET NO. FAA-98-4390, SUPPLEMENTAL NOTICE OF PROPOSED
RULEMAKING: FLIGHT PLAN REQUIREMENTS FOR HELICOPTER OPERATIONS
UNDER INSTRUMENT FLIGHT RULES**

DEPT. OF TRANSPORTATION
DOCKETS
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The National Air Transportation Association (NATA) represents the interests of over 2,000 aviation businesses nationwide including operators of helicopters utilized in on-demand air charter under the requirements of Federal Aviation Regulations Part 135.

NATA continues to support the FAA's initiative to develop alternate airport planning and weather minima requirements for helicopter flight conducted under instrument flight rules (IFR). The regulatory changes detailed in this supplemental notice recognize the unique operational characteristics of helicopter flight and will improve the safety of helicopter operations by increasing their access to the IFR system.

While the Association supports the FAA's action in this rulemaking, NATA concurs with the recommendation of the Helicopter Association International (HAI) to amend the language pertinent to visibility minimum requirements. The language for the visibility requirement in the previous rulemaking proposal was slightly modified in this supplemental proposal and results in an increase of the minimum visibility from 1 mile to 1 1/2 miles. NATA believes that this was not the intent of the FAA in amending the language and recommends adoption of the language proposed by HAI for section 91.169(c)(1)(ii).

NATA appreciates the efforts of the Agency and anticipates the promulgation of a final rule in this matter.

Sincerely,

Andrew V. Cebula
Vice President